

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*¹
Debtors.

Chapter 11

Case No. 23-10831
(Jointly Administered)

Related Docket Nos. 975, 1076

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING SECOND
INTERIM APPLICATION OF TROUTMAN PEPPER HAMILTON SANDERS LLP, AS
COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR THE
PERIOD FROM OCTOBER 1, 2023, THROUGH AND INCLUDING DECEMBER 31, 2023**

The Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned cases, by and through its undersigned counsel, hereby certifies as follows:

1. On February 14, 2024, the Committee filed the *Second Interim Application of Troutman Pepper Hamilton Sanders LLP, as Counsel for the Official Committee of Unsecured Creditors, for the Period from October 1, 2023, Through and Including December 31, 2023* [Docket No. 975] (the “Interim Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The notice filed with the Interim Application established a deadline of March 5, 2024, at 4:00 p.m. (ET) to respond to the Interim Application. A hearing on the Interim Application is scheduled for March 14, 2023, at 3:00 p.m. (ET).

2. The Committee received no formal or informal responses with respect to the Interim Application prior to the objection deadline. Consequently, on March 7, 2024, the Committee filed the *Certificate of No Objection Regarding Second Interim Application of Troutman Pepper Hamilton Sanders LLP, as Counsel for the Official Committee of Unsecured*

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Creditors, for the Period from October 1, 2023, Through and Including December 31, 2023 [Docket No. 1076].

3. Attached hereto as **Exhibit A** is the proposed order approving the Interim Application. A copy of the proposed order, along with the Interim Application and related materials, has been delivered to the Chambers of The Honorable Brendan L. Shannon.

[Remainder of page intentionally left blank]

WHEREFORE, the Committee respectfully requests that the proposed order attached hereto as **Exhibit A** be entered at the Court's earliest convenience.

Dated: March 11, 2024
Wilmington, Delaware

Respectfully submitted,

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

/s/ Tori L. Remington

David M. Fournier (DE 2812)
Tori L. Remington (DE 6901)
Hercules Plaza, Suite 5100
1313 N. Market Street, Suite 5100
Wilmington, DE 19801
Telephone: (302) 777-6500
Email: david.fournier@troutman.com
tori.remington@troutman.com

-and-

Francis J. Lawall (admitted *pro hac vice*)
3000 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103-2799
Telephone: (215) 981-4451
Fax: (215) 981-4750
Email: francis.lawall@troutman.com

-and-

Deborah Kovsky-Apap (admitted *pro hac vice*)
875 Third Avenue
New York, NY 10022
Telephone: (212) 808-2726
Fax: (212) 704-6288
Email: deborah.kovsky@troutman.com

-and-

Sean P. McNally (admitted *pro hac vice*)
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7317
Fax: (248) 359-7700
Email: sean.mcnally@troutman.com

*Counsel to the Official Committee of
Unsecured Creditors*